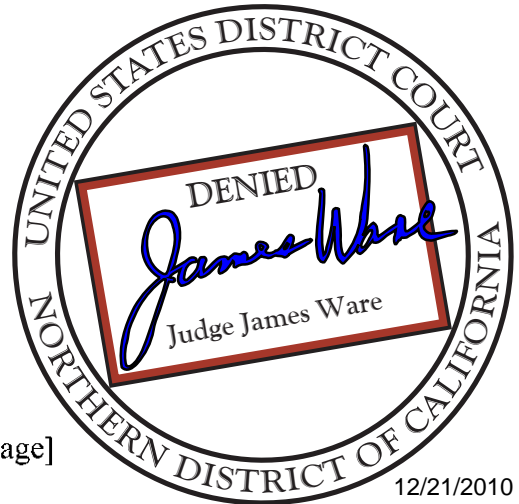


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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

**SARAH PEREZ,  
MICHELLE LACKNEY,  
RACHEL STEWART AND  
RACHEL HARDYCK,**

On behalf of themselves and all  
others similarly situated,

Plaintiffs,

vs.

**STATE FARM MUTUAL  
AUTOMOBILE INS. CO., et al.,**

Defendants.

Case No.: C06-01962 (JW) (PVT)

**STIPULATION PURSUANT TO  
CIVIL L.R. 6-2(a) TO ADJUST  
CLASS SCHEDULE**

Come now the Plaintiffs and Defendants with this Stipulation pursuant to Local Rule 6-2(a), proposing the adjustment of the Court's Scheduling Order Re: Class Discovery entered on November 10, 2010 to facilitate preparation of expert reports and expert discovery in advance of the class hearing. The Parties respectfully submit the following:

1 (1) Under the Court's order, Plaintiffs' class expert report(s) must be served on  
2 March 11, 2011, 63 days before the close of class discovery. Defendants must serve their  
3 "opposition" reports the same day without having seen Plaintiffs' report(s) and have only 14  
4 days to do rebuttal reports.

5 (2) Previous time modifications in this case have been:

- 6 a. Stipulated Request for Order Changing Time for Newly Added Defendant  
7 Liberty Mutual to Respond to First Amended Complaint, entered on April, 28,  
8 2006;  
9  
10 b. Stipulation and [Proposed] Order Setting Briefing Schedule on Motions to  
11 Dismiss, entered on May 24, 2006;  
12  
13 c. Stipulation and [Proposed] Order Granting Plaintiffs Leave to File Second  
14 Amended Complaint and Preserving Briefing Schedule and Hearing Date on  
15 Defendants' Joint Motions to Dismiss, entered on July 11, 2006;  
16  
17 d. Stipulation and Proposed Order Relating to Scheduling of Motions to Dismiss,  
18 entered on April 28, 2009;  
19  
20 e. Stipulation and [Proposed] Order to Continue Case Management Conference,  
21 entered on September 13, 2010; and  
22  
23 f. Stipulation Pursuant to Civil L.R. 6-1(a) to Extend Time for Defendants to  
24 Answer or Otherwise Respond to Plaintiffs' Third Amended Complaint,  
25 entered on November 19, 2010.

26 (3) The proposed Stipulation would adjust class scheduling as follows:

- 27 a. New class fact discovery shall not be served after April 5, 2011.  
28

1 b. Plaintiffs shall submit their class motion and expert disclosures on or before  
2 May 19, 2011.

3 c. Plaintiffs' experts will be deposed within 21 days thereafter.

4 d. Defendants' class response and expert disclosures will be due on or before  
5 June 28, 2011.

6 e. Plaintiffs will have 21 days to depose Defendants' experts.

7 f. Plaintiffs' class reply and the Parties' supplemental/rebuttal reports will be  
8 due on or before July 29, 2011.

9 g. The class hearing will follow on the next available date that the Court's  
10 calendar will accommodate.  
11

12  
13 A proposed Order is attached.  
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28

Dated: December 16, 2010

Respectfully submitted,

By     //S//      
On Behalf of All Plaintiffs

**By**           //S//                 
**On Behalf of All Defendants**

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STIPULATION TO ADJUST CLASS SCHEDULE  
Case No. 5:06-cv-01962-JW-PVT – Page 4

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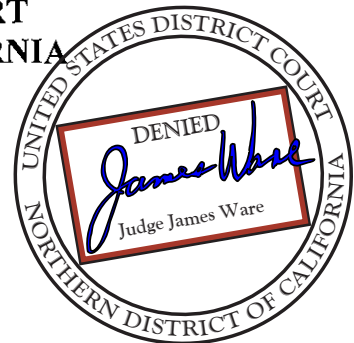
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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
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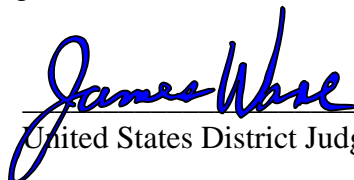
Defendants.

Case No.: C06-01962 (JW) (PVT)

**[PROPOSED] ORDER**

The previous schedule shall remain unchanged to advance the case.

Dated: December 21, 2010

  
United States District Judge